



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 02 2015

CERTIFIED MAIL 7015 1730 0002 0524 4706
RETURN RECEIPT REQUESTED

Mr. Rodney Maronay
Regional Environmental Health and Safety Manager
Parker-Hannifin Corporation
Mobile Climate Systems Division
1620 Highway 6 East
Batesville, Mississippi 38606

Re: Information Request Pursuant to Section 308 of the Clean Water Act,
Parker Hannifin Corporation, Permit No.: MSP090042, issued by Mississippi Department of
Environmental Quality

Dear Mr. Maronay:

On March 25, 2014, the U.S. Environmental Protection Agency Region 4 and the State of Mississippi Department of Environmental Quality, performed an inspection of Parker Hannifin Corporation's (Parker Hannifin) facility (Facility) located at 1620 Highway 6 East in Batesville, Panola County, Mississippi. The purpose of the inspection was to evaluate Parker Hannifin's compliance with the requirements of Sections 301 and 307(d) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1317(d); and the regulations promulgated thereunder at 40 C.F.R. Part 403; the State of Mississippi pretreatment regulations at 11 Miss. Admin. Code Pt. 6, R. 1.1.4.M.; and Permit No. MSP090042 issued to the Facility by the State of Mississippi, effective May 2, 2011 and expiring April 30, 2016.

The EPA is continuing to investigate the Facility's compliance with the CWA. Therefore, pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, the EPA hereby requests that Parker-Hannifin provide the information set forth in Enclosure A 21 calendar days of your receipt of this letter.

Parker Hannifin's response should be submitted to:

Mr. Brad Ammons
U.S. Environmental Protection Agency, Region 4
Water Protection Division
NPDES Permitting & Enforcement Branch
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

All information submitted must be accompanied by the following certification that is signed by a duly authorized company official in accordance with 40 C.F.R. § 122.22:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Failure to provide a full and complete response to this information request or to adequately justify a failure to respond within the time frame specified above may result in an EPA enforcement action pursuant to federal law, including but not limited to the CWA, 33 U.S.C. § 1319 and 18 U.S.C. § 1001.

If Parker Hannifin believes that any of the requested information constitutes confidential business information, it may assert a confidentiality claim with respect to such information, except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure B.

In addition, the Securities and Exchange Commission (Commission) requires its registrants to periodically disclose environmental legal proceedings in statements filed with the Commission. To assist Parker Hannifin, Enclosure C is a document entitled *Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings*.

We appreciate your prompt attention to this matter. Should you have any questions regarding this letter, please contact Mr. Brad Ammons at (404) 562-9769. Legal inquiries should be directed to Ms. Mita Ghosh, Chief, Office of Water Legal Support, at (404) 562-9568.

Sincerely,



Stacey Bouma, Acting Chief
NPDES Permitting & Enforcement Branch
Water Protection Division

Enclosures

cc: Mr. Chris Sanders
Mississippi Department of Environmental Quality

Mr. Barry Litchfield
Parker-Hannifin Corporation

ENCLOSURE A

INFORMATION REQUEST PURSUANT TO SECTION 308 OF THE CLEAN WATER ACT

Instructions

1. Identify the person(s) responding to this Information Request.
2. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.
3. Precede each answer with the text and the number of the Question and its subpart to which the answer corresponds.
4. All documents submitted must contain a notation indicating the Question and subpart of the Question to which they are responsive.
5. In answering each Information Request Question and subpart thereto, identify all documents and persons consulted, examined or referred to in the preparation of each response, and provide true and accurate copies of all such documents.
6. If information unknown or unavailable to you as of the date of your submission of a response to this Information Request should later become known or available to you, then you must supplement your response to the EPA. If you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, then you must notify the EPA as soon as possible.
7. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.
8. Where specific information has not been memorialized in a document, but is nonetheless responsive to a Question, you must respond to the Question by providing the information in writing.
9. If information responsive to this Information Request is not in your possession, custody or control, then identify the person from whom such information may be obtained and their contact information.
10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question or who may be able to provide additional responsive documents, then identify such persons, their contact information, and the additional information or documents that they may have.
11. The EPA requests that all documents provided in an electronic format be compatible with pdf.
12. The EPA requests that all spreadsheet information be in an electronic format and compatible with MS Excel.

13. If any Question relates to activities undertaken by entities other than the recipient of this Information Request, and to the extent that you have information pertaining to such activities, then provide such information for each entity.

Definitions

1. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in the Clean Water Act or its implementing regulations, in which case the statutory or regulatory definitions shall control.
2. Words in the masculine may be construed in the feminine if appropriate, and vice versa, and words in the singular may be construed in the plural if appropriate, and vice versa, in the context of a particular question or questions.
3. The terms “And” and “Or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed outside its scope.
4. The term “Identify” means, with respect to a natural person, to set forth the person’s name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
5. The term “Identify” means, with respect to a document, to provide its customary business description; its date; its number, if any (invoice or purchase order number); the identity of the author, addressee and/or recipient; and substance of the subject matter.
6. The term “Identify” means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
7. The term “Facility” means Parker Hannifin Corporation’s facility located at 1620 Highway 6 East in Batesville, Panola County, Mississippi.
8. The term “You” and “Your” shall mean Parker Hannifin Corporation.
9. The term “Permit” shall mean an industrial user permit issued to the Facility by the Control Authority.
10. “Control Authority” shall have the meaning set forth in 40 C.F.R. § 403.3(f).

Questions

1. Identify the names and addresses of the current owner(s) of the Facility property. Specify the legal name with the exact spelling of each owner. Specify the state of incorporation and principal place of business for each corporate owner. If incorporated, provide the name and mailing address of the registered agent. Additionally, provide a copy of the deed(s) of ownership of the Facility.
2. If the Facility has applied for and/or received a Permit for such discharges, then provide a timeline of the wastewater permitting history for the Facility from 2009 to the present, including:
 - a. the date(s) that Permit applications were either requested by the Control Authority or submitted by the Facility;
 - b. the date(s) that draft or final Permit(s) were received by the Facility; and
 - c. the date(s) that comments on such draft(s) were submitted to the Control Authority.

If the Facility has never received a Permit for the discharge of process wastewaters to a publicly owned treatment works, then please explain this in the response.

3. Provide complete copies of all communication to or from the Control Authority and to or from the public sewer utility, from 2009 to the present, which concerns the Facility's process wastewater discharge(s). This information should be organized in chronological order with a table of contents. Communication that only regards water/sewer service billing or payment can be excluded.
4. Provide a schematic of the pretreatment equipment/tanks installed and/or in use during the March 25, 2014 EPA/MDEQ inspection, including, but not limited to, all sources of influent, the series in which the tanks are used, etc. Provide schematics for both outfall 001 and 002.
5. Provide a manufacturer's product sheet and Material Safety Data Sheet (MSDS) for the "Technoclean" chemical used in the tank at outfall 001 noted during the March 25, 2014 EPA/MDEQ inspection.
6. Describe the pretreatment equipment/tanks installed (including the date(s) of installation) and timeline of when said pretreatment equipment/tanks were operational during the period of time that the "Technoclean" tank was in use.
7. Provide a timeline identifying the Facility's construction, and narrative describing its pretreatment equipment and their purpose and acquisition dates. Include the dates when the initial construction of the Facility began and when the initial discharge of process wastewater to the public sewer began. In addition, provide the timeline for when: (1) the "Technoclean" tank was installed, (2) when the "Technoclean" tank was first used for pretreatment, (3) when the Facility ceased using the "Technoclean" tank, (3) when the brazing line(s) was installed/constructed and (4) when the brazing line(s) was first used for production.

8. When did the Facility first discharge to the POTW at outfall 001 with the “Technoclean” tank in service?
9. Did the Facility monitor outfall 002 (Brazing Line(s)) the same as monitoring outfall 001 (Cleaning Line) during the use of the “Technoclean” tank?
10. If the Facility was purchased in whole or part, then also provide the final contract date(s) for the purchase(s). Provide the final purchase contract dates and detailed descriptions of any substantive modifications, additions, or replacements made to any production equipment.
11. Describe the process (or in the alternative, if there is a written Standard Operating Procedure (SOP), provide a copy said SOP) that the Facility uses to discharge the liquid(s) in the “Technoclean” chemical tank to the POTW and how the Facility refills/refilled the “Technoclean” tank. Provide any necessary details, including, but not limited to, the amount of “Technoclean” chemical in a refilled tank vs. the amount of makeup water and/or potable water in the tank; the concentration of “Technoclean” in the tank, final liquid level in the “Technoclean” tank, total capacity of the “Technoclean” tank, etc.
12. Provide any production SOPs, including, but not limited to, the temperature of the “Technoclean” tank during use, the length of time a product is dipped in the “Technoclean” tank, etc.
13. Provide all wastewater monitoring data collected by, or under contract to, the Facility from 2009 to the present for both outfalls 001 and 002 (by outfall), including, but not limited to, Self-Monitoring Reports (SMRs) submitted to MDEQ. Specifically, provide any monitoring data for Total Aluminum, Total Cadmium, Total Chromium, Total Copper, Total Lead, Total Nickel, Total Silver, Total Zinc, Total Cyanide and Total Toxic Organics (TTO). TTO, in this matter, shall be as defined as TTO is defined at 40 CFR §433.11(e). In addition, provide any monitoring for field collected monitoring, including, but not limited to, Flow, pH, Temperature, etc. The monitoring data shall be provided by outfall (outfall 001 vs. outfall 002). The EPA prefers that such data be provided as a summary in an electronic spreadsheet format compatible with MS Excel. Present the data for laboratory-tested samples separately from data for flow, pH, temperature and other field- or continuously-monitored parameters. Include the following for each data point:
 - a. Parameter monitored;
 - b. Date monitored (month/day/year);
 - c. Analytical result;
 - d. Units;
 - e. Analytical method;
 - f. Sample type (grab, time-proportional composite, or flow-proportional composite)
 - g. Flow recorded at the time of monitoring;

- h. Sampling location; and
- i. Flow monitoring location.

Analytical methods need only be provided for laboratory analyses; for flow, pH, temperature and other field- or continuously-monitored parameters, identify the testing equipment used and their calibration frequencies. For flow monitoring data, only (a), (b), (c), (d), and (i) need to be provided. Location descriptions for (h) and (i) should be identifiable on the schematics provided in item #4 above.

- 14. Provide a copy of Effective Permit(s) for the timeframe of March 2011 to Present.
- 15. Provide a copy of any meeting notes from meeting(s) with MDEQ, inspection reports, notices of violations, administrative orders, cease and desist orders, and any related correspondence from local, State or federal agencies related to the process wastewater discharge from the Facility from 2009 to the present.
- 16. Provide dated copies of the Baseline Monitoring Report (BMR) required by 40 CFR §403.12(b) and the transmittal letter indicating when it was submitted to MDEQ.
- 17. Provide dated copies of the 90-day report required by 40 CFR §403.12(d) and the transmittal letter indicating when it was submitted to MDEQ.

